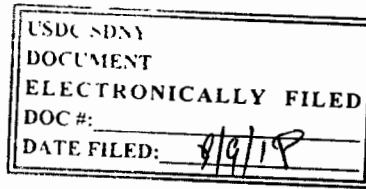


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August 6, 2018

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: United States v. Kaleil Isaza Tuzman, S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully submit this letter on behalf of Kaleil Isaza Tuzman to seek the Court's permission for him to travel out-of-state to meet his two newborn nephews and to spend time with his daughter while she is in Baton Rouge, Louisiana. Mr. Isaza Tuzman's sentencing hearing was recently adjourned until October 19, 2018.

Specifically, Mr. Isaza Tuzman respectfully requests the Court's permission to travel to New Orleans and Baton Rouge, Louisiana, from Monday, August 13 to Saturday, August 25 to visit with his sister Nomi and attend his nephew Cypress' *bris*,¹ and to visit his daughter in Baton Rouge, where she will be visiting her maternal grandparents from August 20-25. As Mr. Isaza Tuzman's daughter attends school abroad, this is likely his final opportunity to see her prior to his sentencing.

Mr. Isaza Tuzman also respectfully requests the Court's permission to travel to Massachusetts from August 29 through September 4, in order to visit with his parents and siblings Surya, Intiya and Emmanuel. His sister Surya delivered her son Ilo on July 24, 2018, and Mr. Isaza Tuzman hopes to travel over the Labor Day weekend to Massachusetts to get to know his new nephew.

Neither of Mr. Isaza Tuzman's sisters—Nomi (Cypress' mother) and Surya (Ilo's mother)—are able to travel with their newborn babies to visit Mr. Isaza Tuzman, given the age of the infants and their post-partum conditions.

¹ The *bris* is a religious circumcision ceremony that typically occurs 8 days after a boy's birth. Cypress was born on July 30, 2018, but his *bris* has been delayed because he was born with jaundice.

MEMO ENDORSED
The application is granted
as to travel to Baton Rouge
from August 20 to August
25. The application is
otherwise denied.
SO ORDERED:

Paul G. Gardephe, U.S.D.J.

Aug 8, 2018

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For both the proposed Louisiana and Massachusetts trips, Mr. Isaza Tuzman would follow the same protocol previously approved by the Court and Pretrial Services—staying with family when space allows and at a local motel when needed (always subject to Pretrial Services' approval and supervision). If these leave requests are granted, all other terms and conditions of home detention would remain in place, and Mr. Isaza Tuzman would remain at all times under the supervision of Pretrial Services. Should the Court desire that Mr. Isaza Tuzman travel for only some of this time period, Mr. Isaza Tuzman would organize his travel to match whatever travel dates the Court sees fit.

This request has been communicated to Pretrial Services, which responded as follows: "Our office does not consent to out-of-district travel for defendants on home detention as a blanket general policy. This objection is not specific to Mr. Tuzman, who has been fully compliant with PSA supervision and who has traveled with the Court's permission numerous times without incident. Our office will enter the schedule once approved by the Court."

The government has informed us that it objects to this request.

Mr. Isaza Tuzman has previously requested permission from the Court to travel to Louisiana and Massachusetts, including to visit his daughter, with the Court's permission. *See* ECF Nos. 331, 788. In these cases and every other time Mr. Isaza Tuzman has travelled outside this District as permitted by the Court, he has left from and returned to this District as scheduled and without incident.

Mr. Isaza Tuzman plans to submit a leave request to spend the upcoming Jewish High Holidays with his family in Philadelphia, PA, as he has done for the past two years. Neither his sisters Nomi or Surya nor their newborns will be attending these gatherings, however, which has prompted this separate request.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Avi Weitzman

Avi Weitzman

cc. All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via E-mail)